

21

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff

v.

Case No. 19-30044  
Originating No.

CHRISTIAN NEWBY,

Defendant.

**GOVERNMENT'S PETITION  
FOR TRANSFER OF DEFENDANT TO  
ANOTHER DISTRICT AND SUPPORTING BRIEF**

Pursuant to Rule 5(c)(3)(D) of the Federal Rules of Criminal Procedure, the United States of America hereby petitions the Court for an order transferring defendant **CHRISTIAN NEWBY**, to answer to charges pending in another federal district, and states:

1. On **January 31, 2019**, defendant was arrested in the Eastern District Michigan in connection with a federal arrest warrant issued in the **Northern District of Illinois based on a complaint**. Defendant is charged in that district with violation of **18 USC 1343 – Wire Fraud**.

2. Rule 5 requires this Court to determine whether defendant is the person named in the arrest warrant and is entitled to a preliminary examination as described in Paragraph One above. See Fed. R. Crim. P. 5(c)(3)(D)(ii).

WHEREFORE, the government requests this Court to conduct transfer proceedings in accordance with Rule 5 of the Federal Rules of Criminal Procedure.

Respectfully submitted,

MATTHEW J. SCHNEIDER  
United States Attorney

A handwritten signature in black ink, appearing to read 'MR' with a large, stylized flourish above it.

MATTHEW ROTH  
Assistant U.S. Attorney  
211 W. Fort Street, Suite 2001  
Detroit, MI 48226  
(313) 226-9100

Dated: February 1, 2019

AO 442 (Rev. 11/11) Arrest Warrant

AUSA Melody Wells (312) 353-1110

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CHRISTIAN A. NEWBY

**WARRANT FOR ARREST**

CASE NUMBER:

**UNDER SEAL**

To: The United States Marshal and Any Authorized Officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay (name of person to be arrested) CHRISTIAN NEWBY, who is accused of an offense or violation based on the following document filed with the court:

☒ Complaint

This offense is briefly described as follows:

wire fraud, in violation of Title 18, United States Code, Section 1343

Date: January 29, 2019
  
*Issuing Officer's signature*
City and state: Chicago, Illinois
Maria Valdez, U.S. MAGISTRATE JUDGE  
*Printed name and title*

Bail fixed at \$ \_\_\_\_\_ by \_\_\_\_\_

*Name of Judicial Officer***Return**

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_

at (city and state) \_\_\_\_\_

Date: \_\_\_\_\_

\_\_\_\_\_  
*Arresting officer's signature*

\_\_\_\_\_  
*Printed name and title*

and therefore should not be filed in court with the executed warrant unless under seal.

*(Not for Public Disclosure)*

Name of defendant/offender: CHRISTIAN A. NEWBY

Known aliases: \_\_\_\_\_

Last known residence: 236 Lewis Avenue, Milan Michigan

Prior addresses to which defendant/offender may still have ties: \_\_\_\_\_

Last known employment: \_\_\_\_\_

Last known telephone numbers: \_\_\_\_\_

Place of birth: \_\_\_\_\_

Date of birth: \_\_\_\_\_

Social Security Number: \_\_\_\_\_

Height: \_\_\_\_\_

Weight: \_\_\_\_\_

Sex: Male

Race: White

Hair: \_\_\_\_\_

Eyes: \_\_\_\_\_

Scars, tattoos, other distinguishing marks: \_\_\_\_\_

History of violence, weapons, drug use: \_\_\_\_\_

Known family, friends, and other associates (name, relation, address, phone number): \_\_\_\_\_

FBI number: \_\_\_\_\_

Complete description of auto: \_\_\_\_\_

Investigative agency and address: JOHN DONNELLY, Amtrak OIG, (312) 544-5733

Name and telephone numbers (office and cell) of pretrial services or probation officer (if applicable): \_\_\_\_\_

Date of last contact with pretrial services or probation officer (if applicable): \_\_\_\_\_

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Melody Wells (312) 353-1110

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

CHRISTIAN A. NEWBY

CASE NUMBER:  
**UNDER SEAL**

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about June 11, 2018, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, the defendant violated:

*Code Section*

*Offense Description*

Title 18, United States Code,  
Sections 1343

wire fraud

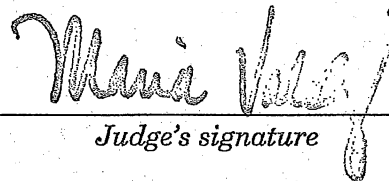
This criminal complaint is based upon these facts:

X Continued on the attached sheet.

JOHN D. DONNELLY  
Special Agent, Amtrak OIG

Sworn to before me and signed in my presence.

Date: January 29, 2019



*Judge's signature*

City and state: Chicago, Illinois

Maria Valdez, U.S. Magistrate Judge

*Printed name and Title*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

SS

**AFFIDAVIT**

I, JOHN D. DONNELLY, being duly sworn, state as follows:

1. I am a Senior Special Agent with the Amtrak, Office of Inspector General (Amtrak OIG). I have been so employed since September 2017. Prior to that, I was employed as a United States Postal Inspector for over 21 years, and was responsible for investigating a number of federal crimes, including mail and wire fraud schemes, access device fraud, and identity theft. During my last seven years as a Postal Inspector I was a Team Leader, and supervised a team of Inspectors investigating these crimes. I have conducted and directed numerous investigations into schemes to defraud individuals and entities involving the use of the mails, the Internet, stolen credit card information, and stolen identities to further criminal activity. I have conducted and participated in the execution of numerous federal search warrants. As part of my duties as an Amtrak OIG Senior Special Agent, I investigate criminal violations relating to fraud, waste and abuse directed at Amtrak.

2. This affidavit is submitted in support of a criminal complaint alleging that CHRISTIAN A. NEWBY has violated Title 18, United States Code, Section 1343. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging NEWBY with wire fraud, in violation of Title 18, United States Code, Section 1343, I have not included each and every fact known to me concerning this investigation. I have set forth only the

facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is also submitted in support of the government's application for the issuance of a warrant to seize and preserve for forfeiture any and all funds up to \$49,918.25 maintained in Chase Bank Account Number XXXXX9218 ("**Subject Bank Account 1**"), all funds up to \$8,274.99 maintained in Bank of America Bank Account Number XXXXXXXXXX3514 ("**Subject Bank Account 2**"), all funds up to \$15,677 maintained in Metabank Account Number XXXXXXXX0387 ("**Subject Bank Account 3**"), all funds up to \$189,938.25 maintained PayPal Account Number XXXXXXXXXXXXXXXXXXXX9165 ("**Subject Bank Account 4**") and all funds up to \$4,800 maintained in University of Michigan Credit Union Account XXXXXX7534 ("**Subject Bank Account 5**" and collectively the "**Subject Bank Accounts**" and "**Subject Funds**"). In particular, there is probable cause to believe that the **Subject Bank Accounts** are is used by CHRISTIAN A. NEWBY in order to receive money derived from the scheme to use stolen credit card information to defraud Amtrak and financial institutions described in more detail below. For the reasons set forth below, I submit that there is probable cause to believe that the **Subject Funds** constitute funds received as proceeds traceable to violations of 18 U.S.C. § 1343, and thus subject to seizure and forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and (D).

4. The facts set forth in this affidavit are based upon my personal observations, my review of records, my training and experience, and information

obtained from other agents with whom I am jointly investigating NEWBY. This affidavit is intended to show merely that there is sufficient probable cause to support the charge and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

5. As described in more detail below, I respectfully submit that there is probable cause to believe that NEWBY, through the use of interstate wires, executed a scheme to defraud Amtrak and banks, by selling Amtrak electronic vouchers that were purchased using stolen credit card information, on the internet auction site eBay. As part of the scheme, NEWBY fraudulently purchased trips via the Amtrak website www.Amtrak.com, and by using the Amtrak Mobile Application, using stolen credit card information. Also as part of the scheme, Newby cancelled the trips before the charges were determined to be unauthorized, and took vouchers which he then sold to eBay customers.

## **I. BACKGROUND**

### **A. Amtrak**

6. Congress created the National Railroad Passenger Corporation, doing business as Amtrak ("Amtrak"), as a private, for-profit Government corporation, pursuant to the passage of the Rail Passenger Service Act of 1970, to operate a nationwide system of passenger rail transportation.

7. Amtrak receives significant federal funding through U.S. Department of Transportation (DOT) grants to cover its operating expenses and to maintain and



improve its rolling stock (e.g. locomotives and passenger cars) and fixed capital assets (e.g. stations, track, and signals etc.).

8. In addition to providing a substantial portion of Amtrak's funding, the federal government also provides oversight of how the funds are spent. The Federal Railroad Administration (FRA), as part of the DOT, administers the grants to Amtrak and provides federal oversight of Amtrak's grants.

9. Amtrak's ownership and corporate structure are heavily controlled by the federal government. All of Amtrak's preferred stock and most of its common stock are owned by the federal government, specifically by DOT.

10. Pursuant to 49 USC 24302, Amtrak's ten-member Board of Directors is composed of the Secretary of the United States Department of Transportation; eight other board members appointed by the President of the United States and confirmed by the United States Senate; and the President of Amtrak, who appointed by the members of the Board. Board members are subject to salary limits set by Congress, and the appointed Board members are removable by the President of the United States without cause. These branches of the federal government exercise substantial supervision over Amtrak's operations. Amtrak is required to submit annual reports to Congress and the President of the United States detailing such information as route-specific ridership and on-time performance. Congress conducts oversight hearings to delve into details of Amtrak's budget, routes and prices. The Freedom of Information Act applies to Amtrak. Amtrak is a "designated federal entity" under the Inspector General Act of 1978, and must maintain an inspector general. Amtrak

is statutorily required to, in addition to advancing its economic interests, pursue numerous public objectives, such as providing reduced fares to the disabled and elderly, ensuring mobility in times of national disaster, and maintaining certain specific routes.

11. Amtrak has been substantially supported by federal funds, well in excess of \$10,000 each calendar year. In recent years, including 2015, 2016, and 2017, Amtrak has received over \$1 billion in federal appropriations each year. In 2018, to date, Amtrak has received over \$447 million dollars in federal funding.

12. At all times relevant to this affidavit, Amtrak operated a passenger rail system throughout the United States and offered the public rail passenger travel services for a fee. Customers wishing to purchase tickets from Amtrak had several options for doing so, among which were the Amtrak Mobile Application and internet booking through Amtrak.com. Amtrak utilized computer databases such as ARROW and STARS to process and store rail ticket and customer information. It also uses computer systems operated by vendors and banks to process credit and debit card payments. The servers for the Amtrak computer systems are located in Southbury, Connecticut. Any time a customer purchases or changes a trip, they communicate via interstate wires with the servers in Connecticut.

#### **B. eBay**

13. eBay.com is an Internet site on which computer and smart phone users can mass-advertise items for sale, either by auction, or direct sale. Prior to buying or selling on eBay, users are required to register with eBay by providing a name,

address, e-mail address and telephone number. eBay allows users to select a "User ID," which identifies the user to other eBay users during business. When an individual registers with eBay via the Internet, the identifying information utilized to establish the eBay account is transmitted from the user's location to eBay. Although eBay is accessible by anyone who has unfettered access to the Internet, the information users transmit to eBay via the Internet (such as registration information) is directed via wire to eBay's collection of computer servers for processing, data storage and future use. These computer servers, which act as the infrastructure for eBay's presence on the Internet, are contained within Internet data centers located outside of Illinois. Accordingly, any information communicated to eBay over its website, including communications between sellers and buyers, are directed via wire to eBay's computer servers in California or Utah.

14. Sellers transmit information via computer or mobile device to the eBay website, describing the property for sale, and defining the method they wish to use to sell the item. Items can be sold via Buy It Now, in which the seller pays an advertised price, or it can be won through bidding in an online auction. Prospective buyers also transmit information via computer to the eBay website, including purchase information on merchandise posted for sale on the website. Once the item is won or bought, the seller of the item and the bidder communicate with each other by e-mail or phone to arrange shipment of and payment for the merchandise. Payment options may be limited by the seller, but often include paying by credit card or PayPal.

### **C. PayPal**

15. PayPal is a company which acts as an intermediary handling payments between buyers and sellers. Rather than providing a credit card number to an unknown seller, an eBay user can set up an account with PayPal. The eBay user provides PayPal with a credit card number or bank account number. PayPal then charges the buyer's PayPal account, and remits the proceeds to the seller's PayPal account. PayPal users can access their account through the internet, by using their computer or a smartphone. PayPal's computer servers are located outside of Illinois.

## **II. STATEMENT OF PROBABLE CAUSE**

16. In July 2018, the Amtrak OIG received information about an eBay seller called woolfor-7, who was offering for sale several Amtrak vouchers. I accessed eBay and reviewed several listings for vouchers that were posted for sale by woolfor-7 at the same time. I noticed that the seller also offered to make custom vouchers for buyers, in any dollar amount requested. I also noticed that the seller was offering vouchers for sale at approximately 60% of their value.

17. Based on my training and experience, I am familiar with schemes by which individuals purchased Amtrak tickets using fraudulent means, canceled the tickets, obtained a voucher (a credit for the value of the original purchase) and then resold the vouchers at a fraction of their face value. As part of my investigations I have come to learn the policies, procedures, and common practices associated with the sale of Amtrak tickets. I know that Amtrak vouchers are only issued when a customer purchases a ticket to travel, and then for some reason cancels the trip. The

voucher is issued in the name of the purchaser, and is good toward future trips on Amtrak. Depending on the type of reservation booked, and the time period between the cancellation and the trip, the customer may receive a refund to their credit card, or would have to take a voucher. Most customers would only have one voucher at a time, as they would use that existing voucher to purchase their next trip, rather than purchasing another trip with their credit card. For an individual to have several vouchers for sale at once, would mean that they continued to purchase additional trips, and cancel those trips and take additional vouchers, rather than use the voucher they had. In my experience, there is no legitimate source for the sale of multiple Amtrak vouchers by one person or entity.

18. A review of eBay records pertaining to the woolfor-7 account showed that the account was opened on September 24, 2017, in the name of Victim 4. Based on information provided by the Illinois Secretary of State, there is no one in Illinois with the name Victim 4 that has been issued a state ID or license. In addition, the address listed on the account is for a business in Chicago which offers co-working spaces for customers for a fee.<sup>1</sup> The email associated with the woolfor-7 eBay account was Subject Email Account 1.

19. eBay records show that on March 13, 2018, the shipping address on the woolfor-7 account was changed to: Chris Newby, Box #135 at the address of a Commercial Mail Receiving Agency in Ann Arbor, Michigan. At my request, a U.S.

---

<sup>1</sup> The co-working space includes the use of office amenities like desk space, internet access, and mail delivery.

Postal Inspector spoke to the owner of the Commercial Mail Receiving Agency, and obtained the Postal Service Form 1583 associated with box #135. The PS Form 1583 reflects that the box was rented by Christian Newby, with an address in Redford, Michigan. Accompanying the box application is a photocopy of Newby's Michigan Driver's License and the registration for his 2008 Chevrolet. The owner advised the Postal Inspector that Newby rented the box on November 1, 2016, and stopped receiving mail there in April 2018. The owner advised that Newby regularly received packages there.

20. I also obtained records from PayPal pertaining to the account used by woolfor-7 to receive payments from individuals who purchased vouchers from woolfor-7 on eBay. The records showed that the account was opened on October 20, 2017, in the name of Victim 4, with Victim 4's date of birth and social security number ###-##-1964. According to a search of a law enforcement database, this social security number belongs to a 24 year old individual, Victim 3, who resides in South Carolina. The address and phone number provided to PayPal were the same as those provided to eBay. The PayPal records reflect that on April 8, 2018, the name Chris Newby and the Commercial Mail Receiving Agency address were added to the account. The email associated with the account was the same email address provided to eBay.

21. A review of both eBay and PayPal records showed that from April 28, 2018, through January 28, 2019 woolfor-7 sold approximately 1,510 Amtrak vouchers valued at approximately \$449,000 on eBay. The records reflect that Newby was paid



via PayPal for each eBay voucher sale and earned approximately \$269,634 in profit from the sales.

22. The records reflect that NEWBY was paid through PayPal for each transaction. My review of the records disclosed that with the exception of one item, a VHS tape, the only thing sold via this eBay account were Amtrak vouchers. Thus, with the exception of that sale, the only money coming into the account was the proceeds from the fraudulent sale of Amtrak vouchers.

23. My analysis of the PayPal records further confirmed that NEWBY is using Victim 4's identity in connection with the scheme and has realized the proceeds of the scheme. On numerous occasions NEWBY used a debit card linked to the Victim 4 PayPal account (the "PayPal debit card") to purchase items and withdraw cash at ATMs. For example, on October 2, 2018, NEWBY used the PayPal debit card to withdraw the proceeds from an ATM at a bank in Maybee, Michigan. Surveillance photos from the bank's ATM show NEWBY conducting the transaction.<sup>2</sup>

24. From the inception of the Amtrak voucher scheme through January 28, 2019, NEWBY, received \$189,938.25 in proceeds in the Victim 4 PayPal Account (**Subject Bank Account 4**). In addition, between May 4, 2018 and January 27, 2019, NEWBY transferred approximately \$79,695.75 in proceeds of the Amtrak scheme from the **Subject Bank Account 4** into three other bank accounts; one at Metabank

---

<sup>2</sup> As part of my investigation I obtained a copy Newby's photo from his Michigan Driver's License. I have also obtained a copy of his booking photo related to a prior arrest by Bloomfield Hills Michigan Police. I have viewed a Facebook page of Christian Newby and have seen images of him there. Based on the above, I am familiar with the appearance of Newby, and can identify him.

(**Subject Bank Account 3**), one at Chase (**Subject Bank Account 1**), and one at the University of Michigan Credit Union (**Subject Bank Account 5**).

25. PayPal records showed that approximately \$59,218.25 in proceeds was transferred to **Subject Bank Account 1**, which was established in NEWBY's name. Chase records show that between September 20, 2018 and October 4, 2018, NEWBY transferred \$4,500 in proceeds from **Subject Bank Account 1** into **Subject Bank Account 2**.

26. Google records for Subject Email Account 1 showed communications between NEWBY and individuals who bought vouchers from NEWBY on eBay in which NEWBY instructed the individuals to pay Newby using a second PayPal account established in Victim 7's name and social security number. The Victim 7 PayPal account was linked to **Subject Bank Account 2**. PayPal records show that from July 2, 2018 to November 20, 2018, NEWBY sold 43 Amtrak vouchers on eBay and received \$7,679 in proceeds into the Victim 7 PayPal account. Records from **Subject Bank Account 2** and PayPal show that between June 3, 2018 and November 29, 2018, Newby transferred approximately \$3,774.99 of proceeds from the Victim 7 PayPal Account into **Subject Bank Account 2**.

27. PayPal records obtained on January 29, 2019 disclose that Newby also transferred approximately \$4,800.00 in proceeds from **Subject Bank Account 1** in proceeds to **Subject Account 5**.

28. PayPal records show that between May 4, 2018 and January 27, 2019, approximately \$15,677.00 in proceeds was transferred from **Subject Bank**



~~Account 4~~ account to **Subject Bank Account 3**, which was also established using Victim 4's identity. There are two addresses linked to the account, one of which is a Post Office Box in Garden City, Michigan, and the other is Box #135 at the Commercial Mail Receiving Agency in Ann Arbor, Michigan which was rented in NEWBY's name. The bank records show that no money was deposited or transferred to **Subject Bank Account 3** other than proceeds from the Amtrak scheme.

29. As part of my investigation, I have gained access to, and become familiar with, certain Amtrak databases which allow me to research vouchers and trace their origin to specific online purchases. I am also able to determine the credit card used in the original purchase and search Amtrak's chargeback system, to see if the purchase was disputed by the cardholder. I have learned through researching hundreds of transactions that not all fraudulent purchases are disputed through the charge back system. By contacting fraud investigators at card issuing banks, I have learned that it is common for a cardholder to dispute a fraudulent purchase with their bank, and for the issuing bank to reverse the charge for the customer. In those instances, the bank, rather than Amtrak suffers the loss.

30. Based on my training and experience, I know that when an Amtrak voucher is created it can be used to purchase one or more trips until its value is depleted. The voucher can be used up to a year from the date of its creation. Several vouchers can be combined to pay for one trip. That trip can then be cancelled so that one voucher is created from several smaller ones.

31. With the assistance of an Amtrak OIG forensic accountant, I researched the origins of 38 of the 1,100 Amtrak vouchers sold by the woolfor-7 eBay account through December 19, 2018. As of the date of this writing, I have determined from the Amtrak chargeback system, or by contacting investigators at issuing banks, that 36 of the 38 vouchers sold traced back to fraudulent credit card purchases. My research also revealed that the 38 vouchers traced back to 32 different credit cards which were used to make 51 Amtrak ticket purchases. Based on my review of Amtrak data, information provided by card issuing banks and my training and experience, of the 32 credit cards used, 25 of them were used in connection with this scheme. Seven of the vouchers sold to customers were created by combining more than one voucher. During the eight month period from December 2017 to August 2018, the 38 transactions I researched resulted in a loss to Amtrak of approximately \$6,618 and a loss to banks and credit card companies of approximately \$14,957.

32. Each time an item is listed on eBay, eBay captures the IP address that the listing is made from. I reviewed 417 listings of Amtrak vouchers and noted the IP address used to list the item. I looked up the registered owner of the IP on the American Registry of Internet Numbers (ARIN). My review disclosed that 339 listings were made from IP address 104.129.28.114 which is assigned to Quadranet in Chicago. According to their website, Quadranet is a company that provides internet connectivity, cloud storage, and houses computer servers for their customers. Special Agent Jason Porter of the United States Secret Service interviewed a representative

of the Quadranet, who confirmed that the IP is for a VPN server housed in Chicago, Illinois.

**A. June and July 2018 Amtrak Voucher Sales**

33. eBay records reflect that on June 11, 2018, Woolfor-7 created listing #253683895371, which offered for sale a \$254.00 Amtrak voucher for the price of \$190.50. According to eBay records, the listing IP address was the Quadranet IP address in Chicago; 104.129.28.114. As a result, in furtherance of the scheme, the listing of the voucher caused an interstate wire from a computer connected to Quadranet in Chicago, to one of two eBay servers located outside of Illinois. On the evening June 12, 2018, Individual A, of Cleveland, Ohio, purchased the voucher and used it to pay for a trip from New Orleans to Chicago and then Chicago to Cleveland.

34. I next searched the Amtrak ticketing system to determine the original source of payment for the trip booked by Individual A. I determined that the trip was paid for using voucher #V067293774. This voucher was created earlier in the day on June 12, 2018, after a trip booked in the name of Individual C was cancelled, and the voucher was taken. The Individual C trip was paid for by voucher #V280741884. This voucher was created on June 9, 2018, after a trip booked in the name Individual D was cancelled, and the voucher was taken. The Amtrak ticketing system show that the Individual D trip was the result of \$854.00 credit card purchase, made through the Amtrak Mobile App, using card number #####0004. A search of the Amtrak ticketing system disclosed that the Individual D trip was one of five trips purchased using the same credit card ending in 0004. I searched the Amtrak

chargeback system and determined that Amtrak was charged back a total of \$4,148.00 for the five trips, after the cardholder reported to their bank that the charges were fraudulent.

35. eBay records disclose that on July 20, 2018, Woolfor\_7 posted listing #253765441695, which offered for sale a \$75.00 Amtrak voucher for the price of \$50.00. According to eBay records, the listing IP address was the Quadranet IP address in Chicago; 104.129.28.114. On that date, using an eBay account established in an undercover identity, I purchased the above mentioned voucher, for \$50.00. I purchased the trip by logging on to the eBay site from a computer located in the Amtrak OIG office in Chicago, Illinois. I paid for the trip using an undercover PayPal account. Approximately 15 minutes after I made the purchase I received a message from Woolfor\_7, through eBay. In the message NEWBY, using the woolfor-7 account provided the voucher number; V895082667, and an email addressed used to create the voucher. The message included instructions, complete with screenshots from the Amtrak website, on how to convert the voucher into a ticket. The actual value of the voucher was \$80.00. Accordingly, in furtherance of the scheme, NEWBY caused an interstate wire from eBay's server outside of Illinois, to Chicago, Illinois.

36. I searched the Amtrak ticketing system to determine the original source of payment for voucher #V895082667 and saw that it was created after a trip that was created in the name of Individual E was cancelled. The Individual E trip was created using voucher #V211512413. This voucher was created after a trip booked in the name Individual F was cancelled. The Individual F trip was purchased through

the Amtrak.com internet site, using debit card number #####8891, which belonged to Individual B. All of these transactions were completed during the 15 minute period between when I purchased the voucher and received it. Records received from Woodforest National Bank, an FDIC insured financial institution, disclosed that on July 21, 2018, Individual B reported that the Amtrak charge was fraudulent. Woodforest Bank did not submit a chargeback to Amtrak and suffered the loss of \$80.00.

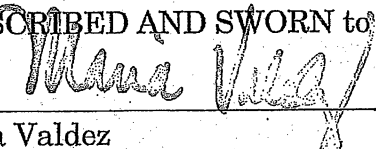
37. Based on the above, I respectfully submit that there is probable cause to believe that, on or about June 11, 2018, in the Northern District of Illinois, and elsewhere, CHRISTIAN NEWBY, for the purpose of executing a scheme to defraud Amtrak, knowingly caused to be transmitted by means of a wire communication in interstate commerce from Chicago, Illinois to a server located outside of Illinois, certain signs, signals and sounds, namely an eBay listing for the sale of an Amtrak voucher, purchased with stolen credit card information, with an approximately value of \$254.00; in violation of Title 18, United States Code, Section 1343.

FURTHER AFFIANT SAYETH NOT.

---

JOHN DONNELLY  
Special Agent, Amtrak OIG

SUBSCRIBED AND SWORN to before me on January 29, 2019.

  
\_\_\_\_\_  
Maria Valdez  
United States Magistrate Judge